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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**NOTICE OF ERRATA AND ERRATA
TO DECLARATIONS OF ANNE M.
SELIN IN SUPPORT OF SEALING
REQUESTS (DKT. NOS. 576 AND 587)**

Defendant Google Inc. (“Google”) respectfully submits the following corrections to certain limited portions of the Declaration of Anne M. Selin in Support of Defendants’ Joint Administrative Motion to File Under Seal filed on January 10, 2014 (Dkt. No. 576) (“January 10, 2014 Selin Declaration”) and the Declaration of Anne M. Selin in Support of Defendants’ Joint Response to Plaintiffs’ Administrative Motion to File Under Seal Portions of Plaintiffs’ Motion to Exclude Expert Testimony Proffered by Defendants filed on January 13, 2014 (Dkt. No. 587) (“January 13, 2014 Selin Declaration”) (collectively, “Declarations”). Specifically, Google wishes to correct certain citations in the Declarations that relate to the Expert Report of Lauren J. Stiroh, Ph.D. (“Stiroh Report”), as set forth below. Because of inadvertent and last minute clerical errors in the compilation of the proposed redactions to the Stiroh Report, the Declarations inadvertently omitted certain text related to the proposed redactions that Google seeks to make to the Stiroh Report. Google was unaware of the error in these until after the Declarations were filed.

January 10, 2014 Selin Declaration (Dkt. 576)

Specifically, Google wishes to make the following corrections to certain references in the January 10, 2014 Selin Declaration (Dkt. 576):

1. On Page 5, Paragraph 12(e), the text should also include “footnote 97”
2. On Page 5, Paragraph 12(g), the text should also include “footnotes 109 and 110 (on page 21)”
3. On Page 5, between Paragraphs 12(g) and 12(h), the text should include “Paragraph 82 (percentage figure related to percent increase in Google’s compensation during 2003)”
4. On Page 5, Paragraph 12(1), the text should also include “portions of subheading d on page 51 and above paragraph 138”
5. On Page 5, Paragraph 12(m), the text should also include “footnote 239”
6. On Page 5, Paragraph 12(o), the text should also include “Paragraph 207”

January 13, 2014 Selin Declaration (Dkt. 587)

Specifically, Google wishes to make the following corrections to certain references in the January 13, 2014 Selin Declaration (Dkt. 587):

- 1 1. On Page 3, Paragraph 5(e), the text should also include “footnote 97”
- 2 2. On Page 3, Paragraph 5(g), the text should also include “footnotes 109 and 110 (on page
- 3 21)”
- 4 3. On Page 3, between Paragraphs 5(g) and 5(h), the text should include “Paragraph 82
- 5 (percentage figure related to percent increase in Google’s compensation during 2003)”
- 6 4. On Page 3, Paragraph 5(l), the text should also include “portions of subheading d on page
- 7 51 and above paragraph 138”
- 8 5. On Page 3, Paragraph 5(m), the text should also include “footnote 239”
- 9 6. On Page 3, Paragraph 5(o), the text should also include “Paragraph 207”

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11 For the convenience of the Court, Google will submit courtesy chambers copies of this Errata, as
12 well as the original Declarations to which this Errata relates.

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15 Dated: February 10, 2014

MAYER BROWN LLP

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17 /s/ Anne M. Selin

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